

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CHARLES M. MURRELL III,

Plaintiff,

v.

PATRIOT FRONT, THOMAS ROUSSEAU,  
AND JOHN DOES 1-99,

Defendants.

Civil No. 1:23-cv-11802

**PLAINTIFF CHARLES M. MURRELL III'S REQUEST FOR  
CLERK'S ENTRY OF DEFAULT AGAINST DEFENDANT THOMAS ROUSSEAU**

Pursuant to Federal Rule of Civil Procedure 55(a), Plaintiff Charles M. Murrell III ("Mr. Murrell"), through undersigned counsel, hereby requests that an Entry of Default be made by the Clerk against Defendant Thomas Rousseau for failure to plead or otherwise defend the Complaint filed on August 8, 2023. Doc. No. 1. As grounds for this request Mr. Murrell states as follows:

1. On February 28, 2024, Mr. Murrell, through counsel, caused a process server to serve Thomas Rousseau personally at McLennan County Jail in Waco, Texas. Doc. No. 29; *see* Declaration of Allen M. Thigpen ("Thigpen Decl.") ¶ 2.

2. Thomas Rousseau's deadline to file an answer or otherwise respond to the Complaint was March 20, 2024. That deadline has passed. Thomas Rousseau has neither appeared nor filed an answer or other responsive pleading. Thigpen Decl. ¶ 5.

WHEREFORE, Mr. Murrell respectfully requests that the Clerk enter Thomas Rousseau's Default.

Dated: April 22, 2024

Respectfully Submitted,

CHARLES M. MURRELL III

By his attorneys,

/s/ Allen M. Thigpen

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 22nd of April, 2024, a true and accurate copy of the foregoing was electronically filed using the CM/ECF system.

/s/ Allen M. Thigpen

Allen M. Thigpen